

IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF ALABAMA
 SOUTHERN DIVISION

WILLIAM D. MCCLUSKEY, as Surviving
 Spouse and as Personal Representative
 of the Estate of Mary L. McCluskey,
 deceased,

Plaintiff,

v.

MERCK & CO., INC., a foreign corporation;
 PHIZER INC., a Delaware Corporation;
 PHARMACIA CORPORATION, a Delaware
 Corporation; MONSANTO COMPANY, a
 Delaware Corporation; G. D. SEARLE, LLC,
 a Delaware Corporation; JAMES A.
 STEWART, an Individual; ANNA LEIGH
 WEBB, an Individual; TRAVIS TAYLOR, an
 Individual; Robert Vandelune, an Individual,
 et al,

Defendant.

Case No. _____

AFFIDAVIT OF ROBERT VANDELUNE

STATE OF ALABAMA)
)
 COUNTY OF Houston)

I, Robert Vandelune, under penalty of perjury, state as follows:

1. I am over the age of twenty-one years and am otherwise competent to
 make this affidavit. This affidavit is based upon my personal knowledge.

2. I am currently employed as a pharmaceutical representative (also known as a "detailer") for Pfizer Inc ("Pfizer"). I have been employed by Pfizer as a detailer since 1985.

3. As a detailer, I visit physicians and healthcare providers' offices and provide them FDA-approved package inserts and other FDA-approved information about Pfizer's products, which is referred to as "detailing." My job is to make the physician aware of certain of Pfizer's products, so that he or she can consider whether to prescribe them for particular patients.

4. I am not a physician or pharmacist. I have no specialized medical or pharmacological education. The information and material I use to detail Pfizer's drugs is derived exclusively from education provided to me by Pfizer. Pfizer provides me with the FDA-approved package inserts and other FDA-approved information for the medications I detail. I have no involvement in the development or preparation of package inserts for any drugs, and no control over content or other written warnings.

5. As part of my job duties, I have detailed Celebrex® in the past. However, I do not know whether I visited with or provided any information about Celebrex® to plaintiff's prescribing physician because plaintiff has not identified him or her.

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6. At no time did I have any involvement with the design, manufacture, development or testing of the prescription medication Celebrex®, nor did I have any involvement in the FDA- approved package insert for Celebrex®.

7. At no time did I ever sell, offer to sell, or take orders for the sale of Celebrex® to health care providers, physicians or patients.

8. I have never made any presentations to the general public concerning Celebrex®.

9. I have never met or spoken with the Plaintiff, William D. McCluskey, or Plaintiff's decedent, Mary L. McCluskey.


10. I have never promoted or detailed Celebrex® in Jefferson County, Alabama.



ROBERT VANDELUNE

Before me, the undersigned Notary Public, came Robert Vandelune, who is known to me, and who first being duly sworn, deposed and stated that the averments of this affidavit are true and correct, and who executed this affidavit in my person and present with his hand and seal, on this the 26th day of January, 2007.

(SEAL)



Notary Public
My Commission Expires: 9-15-2010